



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*86 Chambers Street  
New York, New York 10007*

July 18, 2025

**By ECF**

Hon. Valerie Caproni  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *American Civil Liberties Union Foundation, et al. v. U.S. Immigration and Customs Enforcement*, No. 25 Civ. 3271 (VEC)

Dear Judge Caproni:

This Office represents Defendant U.S. Immigration and Customs Enforcement (“ICE”) in the above-captioned action, which Plaintiffs bring pursuant to the Freedom of Information Act, 5 U.S.C. § 552. I write on behalf of both parties, in accordance with the Court’s Order of July 2, 2025, ECF No. 26, to provide a status update.

On July 2, 2025, ICE made its first and final production to Plaintiffs of responsive and non-exempt records. That production included 115 pages, which were withheld in part pursuant to FOIA exemptions (b)(4), (b)(6), (b)(7)(C), and (b)(7)(E). Plaintiffs are in the process of reviewing the production and determining whether they want to challenge any of the withholdings.

The parties will provide a further status update to the Court on or before August 18, 2025. We thank the Court for its consideration.

Respectfully submitted,

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